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6 Care, LLC, d/b/a Spanish Hills Wellness Suites

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8 UNITED STATES DISTRICT COURT
9 DISTRICT OF NEVADA
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11 KAYATANA JACKSON, individually,

12 Plaintiff,

13 vs.

14 SPRING VALLEY HEALTH CARE, LLC,
d/b/a SPANISH HILLS WELLNESS SUITES,
15 a foreign limited-liability company; DOES I-
X; and ROE BUSINESS ENTITIES I-X,
16 inclusive

17 Defendants.
18

CASE NO. 2:18:-cv-01064-JAD-CWH

**STIPULATION AND ORDER
EXTENDING TIME FOR DEFENDANT
SPRING VALLEY HEALTH CARE, LLC
TO FILE AN ANSWER OR OTHERWISE
RESPOND TO PLAINTIFF'S
COMPLAINT
(FIRST REQUEST)**

19 Plaintiff Kayatana Jackson ("Plaintiff") and Defendant Spring Valley Health Care, LLC
20 d/b/a Spanish Hills Wellness Suites ("Defendant"), by and through their respective counsel,
21 hereby stipulate to extend the time for Defendant to file an Answer or otherwise respond to the
22 Complaint in this matter.

23 Plaintiff's Complaint (ECF No. 1) was filed with this Court on June 13, 2018. Defendant's
24 registered agent was served with a copy of the Summons and Complaint on June 15, 2018. Thus,
25 the current deadline for Defendant to Answer or otherwise respond to the Complaint is July 6,
26 2018. Counsel for Defendant needs additional time to investigate potential conflicts and/or obtain
27 conflict waivers from Defendant and from firm clients in an unrelated matter in order to ethically
28 represent Defendant and those parties in separate lawsuits.

1 In order to provide counsel for Defendant sufficient time to appropriately address this
2 potential conflict issue, counsel for Plaintiff and Defendant have agreed to extend the deadline for
3 Defendant to Answer or otherwise respond to Plaintiff's Complaint (ECF No. 1) up to and
4 including **July 20, 2018**. This is the first request by the parties for an extension of time for
5 Defendant to Answer or otherwise respond to Plaintiff's Complaint (ECF No. 1). The parties
6 represent that the time to Answer has not yet expired and this request for extension is not for an
7 improper purpose or to unnecessarily delay this litigation.

8 WHEREFORE, Plaintiff and Defendant respectfully request that this Court enter an Order
9 granting this Stipulation Extending Time for Defendant Spring Valley Health Care, LLC to File an
10 Answer or Otherwise Respond to Plaintiff's Complaint and extending the deadline for Defendant
11 to file its responsive pleading to Plaintiff's Complaint up to and including **July 20, 2018**.
12 DATED this 5th day of July, 2018.

13
14 MAIER GUTIERREZ & ASSOCIATES

LEWIS BRISBOIS BISGAARD &
SMITH LLP

15
16 /s/ Danielle J. Barraza

Joseph A. Gutierrez, Esq.

17 Danielle J. Barraza, Esq.

/s/ Bruce C. Young

Bruce C. Young, Esq.

Scott H. Barbag, Esq.

18 *Attorneys for Plaintiff Kayatana Jackson*

*Attorneys for Defendant Spring Valley
Health Care, LLC, d/b/a Spanish Hills
Wellness Suites*

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22 **IT IS SO ORDERED:**

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24 **UNITED STATES MAGISTRATE JUDGE**

25 **DATED:** July 11, 2018
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